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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

Thomas R. Keane & Susan D. Keane,

Plaintiffs,

v.

United State of America,

Defendant.

Case No. 3:13-cv-05712-MEJ

STIPULATION EXTENDING TIME TO  
ANSWER OR OTHERWISE RESPOND  
AND CONTINUING CASE  
MANAGEMENT CONFERENCE AND  
~~PROPOSED~~ ORDER (Corrects CMC Continued Date)  
AMENDED

IT IS HEREBY STIPULATED by and between Defendant the United States of America (“United States”) and Plaintiffs Thomas R. Keane and Susan D. Keane (“Plaintiffs”), by and through undersigned counsel and pursuant to Fed. R. Civ. P. 16(b)(4) and Local Civil Rule 6-2, that good cause exists and the parties request that the Court continue both the date for the United States to answer or otherwise respond to Plaintiffs’ Complaint, and the Case Management Conference currently scheduled for March 13, 2014, by approximately 30 days, and state as follows in support:

Plaintiffs commenced the instant action on or about December 10, 2013. Upon learning

of the Complaint, the Department of Justice contacted the Internal Revenue Service's Office of Chief Counsel and requested the administrative file associated with this case. The Office of Chief Counsel has yet to provide a copy of the administrative file to the Department of Justice. Without the administrative file, counsel for the United States is unable to prepare an adequate response to the Complaint.

Accordingly, the parties hereby stipulate that the United States shall have until March 7, 2014, to answer or otherwise respond to Plaintiffs' Complaint, and also that the Case Management Conference currently scheduled for March 13, 2014, be continued until April 12, 2014 at 10:00 am. The requested extension is not being made for purposes of delay, but to allow for a review of the relevant administrative materials. No party has obtained any previous extensions in this matter.

Respectfully submitted this 31st day of January, 2014,

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Attorneys for the United States of America

Attorneys for Thomas R. Keane  
and Susan D. Keane

~~[PROPOSED]~~ ORDER

Upon stipulation of the parties, and for good cause shown, it is hereby ORDERED that the United States of America shall have until March 7, 2014, to answer or otherwise respond to Plaintiffs' Complaint.

It is further ORDERED that the Case Management Conference currently scheduled for March 13, 2014 is continued until April <sup>10</sup>~~12~~, 2014 at 10:00 am.

SO ORDERED this 3rd day of February, 2014.

  
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THE HONORABLE MARIA-ELENA JAMES  
UNITED STATES MAGISTRATE JUDGE